



## **PROPOSED**

PERMIT TO OPERATE 13134  
AND  
PART 70 MINOR PERMIT MODIFICATION 13134

Page 1 of 13

EQUIPMENT OWNER:

BreitBurn Energy Company LP

300000

EQUIPMENT OPERATOR:

BreitBurn Energy Company LP

EQUIPMENT LOCATION:

Newlove Lease, Orcutt Hill Oil Field, Santa Barbara County, California

STATIONARY SOURCE/FACILITY:

BreitBurn Energy - Orcutt Hill  
Newlove Lease

SSID: 02667  
FID: 03321

EQUIPMENT DESCRIPTION:

The equipment subject to this permit is listed in the table at the end of this permit.

PROJECT/PROCESS DESCRIPTION:

Operation of a new higher capacity vapor recovery compressor and the operation of three existing wash tanks (IDs 2973, 109949, & 2979) and one crude tank (ID 2974) at increased throughputs.

**PROPOSED**

**PERMIT TO OPERATE 13134**  
**AND**  
**PART 70 MINOR PERMIT MODIFICATION 13134**

Page 2 of 13

**CONDITIONS:**

**9.A Standard Administrative Conditions**

Section A lists the applicable standard administrative conditions for all equipment in this permit. Conditions listed in this section are enforceable by the USEPA, the APCD, the State of California and the public. Where any reference contained in this section refers to any other part of this permit, that part of the permit referred to is federally enforceable. In case of a discrepancy between the wording of a condition and the applicable federal or APCD rule(s), the wording of the rule shall control.

**A.1 Compliance with Permit Conditions:**

- (a) The permittee shall comply with all permit conditions in Sections 9.A, 9.B and 9.C.
- (b) This permit does not convey property rights or exclusive privilege of any sort.
- (c) Any permit noncompliance constitutes a violation of the Clean Air Act and is grounds for enforcement action; for permit termination, revocation and re-issuance, or modification; or for denial of a permit renewal application.
- (d) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (e) A pending permit action or notification of anticipated noncompliance does not stay any permit condition.
- (f) Within a reasonable time period, the permittee shall furnish any information requested by the Control Officer, in writing, for the purpose of determining:
  - (i) compliance with the permit, or
  - (ii) whether or not cause exists to modify, revoke and reissue, or terminate a permit or for an enforcement action. [Re: 40 CFR Part 70.6, APCD Rules 1303.D.1]
- (g) In the event that any condition herein is determined to be in conflict with any other condition contained herein, then, if principles of law do not provide to the contrary, the condition most protective of air quality and public health and safety shall prevail to the extent feasible.

## PROPOSED

### PERMIT TO OPERATE 13134 AND PART 70 MINOR PERMIT MODIFICATION 13134

Page 3 of 13

- A.2 **Emergency Provisions:** The permittee shall comply with the requirements of the APCD, Rule 505 (Upset/Breakdown rule) and/or APCD Rule 1303.F, whichever is applicable to the emergency situation. In order to maintain an affirmative defense under Rule 1303.F, the permittee shall provide the APCD, in writing, a “notice of emergency” within 2 days of the emergency. The “notice of emergency” shall contain the information/documentation listed in Sections (1) through (5) of Rule 1303.F. [*Re: 40 CFR 70.6, APCD Rule 1303.F*]
- A.3 **Compliance Plan:**
- (a) The permittee shall comply with all federally-enforceable requirements that become applicable during the permit term, in a timely manner, as identified in the Compliance Plan.
  - (b) For all applicable equipment, the permittee shall implement and comply with any specific compliance plan required under any federally-enforceable rules or standards. [*Re: APCD Rule 1302.D.2*]
- A.4 **Right of Entry:** The Regional Administrator of USEPA, the Control Officer, or their authorized representatives, upon the presentation of credentials, shall be permitted to enter upon the premises where a Part 70 Source is located or where records must be kept:
- (a) To inspect the stationary source, including monitoring and control equipment, work practices, operations, and emission-related activity;
  - (b) To inspect and duplicate, at reasonable times, records required by this Permit to Operate;
  - (c) To sample substances or monitor emissions from the source or assess other parameters to assure compliance with the permit or applicable requirements, at reasonable times. Monitoring of emissions can include source testing. [*Re: APCD Rule 1303.D.2*]
- A.5 **Payment of Fees:** The permittee shall reimburse the APCD for all its Part 70 permit processing and compliance expenses for the stationary source on a timely basis. Failure to reimburse on a timely basis shall be a violation of this permit and of applicable requirements and can result in forfeiture of the Part 70 permit. Operation without a Part 70 permit subjects the source to potential enforcement action by the APCD and the USEPA pursuant to section 502(a) of the Clean Air Act. [*Re: APCD Rules 1303.D.1 and 1304.D.11, 40 CFR 70.6*]
- A.6 **Prompt Reporting of Deviations:** The permittee shall submit a written report to the APCD documenting each and every deviation from the requirements of this permit or any applicable

**PROPOSED**

PERMIT TO OPERATE 13134  
AND  
PART 70 MINOR PERMIT MODIFICATION 13134

Page 4 of 13

federal requirements within 7 days after discovery of the violation, but not later than 180-days after the date of occurrence. The report shall clearly document 1) the probable cause and extent of the deviation, 2) equipment involved, 3) the quantity of excess pollutant emissions, if any, and 4) actions taken to correct the deviation. The requirements of this condition shall not apply to deviations reported to APCD in accordance with Rule 505. *Breakdown Conditions*, or Rule 1303.F *Emergency Provisions*. [APCD Rule 1303.D.1, 40 CFR 70.6(a) (3)]

- A.7 **Reporting Requirements/Compliance Certification:** The permittee shall submit compliance certification reports to the USEPA and the Control Officer every six months. These reports shall be submitted on APCD forms and shall identify each applicable requirement/condition of the permit, the compliance status with each requirement/condition, the monitoring methods used to determine compliance, whether the compliance was continuous or intermittent, and include detailed information on the occurrence and correction of any deviations (excluding emergency upsets) from permit requirement. The reporting periods shall be each half of the calendar year, e.g., January through June for the first half of the year. These reports shall be submitted by September 1 and March 1, respectively, each year. Supporting monitoring data shall be submitted in accordance with the “Semi-Annual Monitoring/Compliance Verification Report” condition in section 9.C. The permittee shall include a written statement from the responsible official, which certifies the truth, accuracy, and completeness of the reports. [Re: APCD Rules 1303.D.1, 1302.D.3, 1303.2.c]
- A.8 **Federally-Enforceable Conditions:** Each federally-enforceable condition in this permit shall be enforceable by the USEPA and members of the public. None of the conditions in the APCD-only enforceable section of this permit are federally-enforceable or subject to the public/USEPA review. [Re: CAAA, § 502(b)(6), 40 CFR 70.6]
- A.9 **Recordkeeping Requirements:** Records of required monitoring information shall include the following:
- (a) The date, place as defined in the permit, and time of sampling or measurements;
  - (b) The date(s) analyses were performed;
  - (c) The company or entity that performed the analyses;
  - (d) The analytical techniques or methods used;
  - (e) The results of such analyses; and
  - (f) The operating conditions as existing at the time of sampling or measurement.

The records (electronic or hard copy), as well as all supporting information including calibration and maintenance records, shall be maintained for a minimum of five (5) years from date of initial entry by BreitBurn Energy and shall be made available to the APCD upon request. [Re: APCD Rule 1303.D.1.f, 40CFR70.6(a)(3)(ii)(A)]

## PROPOSED

### PERMIT TO OPERATE 13134 AND PART 70 MINOR PERMIT MODIFICATION 13134

Page 5 of 13

- A.10 **Conditions for Permit Reopening:** The permit shall be reopened and revised for cause under any of the following circumstances:
- (a) **Additional Requirements:** If additional applicable requirements (e.g., NSPS or MACT) become applicable to the source which has an unexpired permit term of three (3) or more years, the permit shall be reopened. Such a reopening shall be completed no later than 18 months after promulgation of the applicable requirement. However, no such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended. All such re-openings shall be initiated only after a 30-day notice of intent to reopen the permit has been provided to the permittee, except that a shorter notice may be given in case of an emergency.
  - (b) **Inaccurate Permit Provisions:** If the APCD or the USEPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emission standards or other terms or conditions of the permit, the permit shall be reopened. Such re-openings shall be made as soon as practicable.
  - (c) **Applicable Requirement:** If the APCD or the USEPA determines that the permit must be revised or revoked to assure compliance with any applicable requirement including a federally-enforceable requirement, the permit shall be reopened. Such re-openings shall be made as soon as practicable.

Administrative procedures to reopen and revise/revoke/reissue a permit shall follow the same procedures as apply to initial permit issuance. Re-openings shall affect only those parts of the permit for which cause to reopen exists.

If a permit is reopened, the expiration date does not change. Thus, if the permit is reopened, and revised, then it will be reissued with the expiration date applicable to the re-opened permit. [*Re: 40 CFR 70.7, 40 CFR 70.6*]

- A.11 **Grounds for Revocation:** Failure to abide by and faithfully comply with this permit shall constitute grounds for the APCO to petition for permit revocation pursuant to California Health & Safety Code Section 42307 *et seq.*
- A.12 **Consistency with Analysis:** Operation under this permit shall be conducted consistent with all data, specifications and assumptions included with the application and supplements thereof (as documented in the APCD's project file) and the APCD's analyses under which this permit is issued as documented in the Permit Analyses prepared for and issued with the permit.

## PROPOSED

### PERMIT TO OPERATE 13134 AND PART 70 MINOR PERMIT MODIFICATION 13134

Page 6 of 13

- A.13 **Equipment Maintenance:** The equipment listed in this permit shall be properly maintained and kept in good condition at all times. The equipment manufacturer's maintenance manual, maintenance procedures and/or maintenance checklists (if any) shall be kept on site.
- A.14 **Compliance:** Nothing contained within this permit shall be construed as allowing the violation of any local, state or federal rules, regulations, air quality standards or increments.
- A.15 **Severability:** In the event that any condition herein is determined to be invalid, all other conditions shall remain in force.
- A.16 **Conflict Between Permits.** The requirements or limits that are more protective of air quality shall apply if any conflict arises between the requirements and limits of this permit and any other permitting actions associated with the equipment permitted herein.
- A.17 **Access to Records and Facilities:** As to any condition that requires for its effective enforcement the inspection of records or facilities by the APCD or its agents, the permittee shall make such records available or provide access to such facilities upon notice from the APCD. Access shall mean access consistent with California Health and Safety Code Section 41510 and Clean Air Act Section 114A.
- A.18 **Equipment Identification:** Identifying tag(s) or name plate(s) shall be displayed on the equipment to show manufacturer, model number, and serial number. The tag(s) or plate(s) shall be issued by the manufacturer and shall be affixed to the equipment in a permanent and conspicuous position.
- A.19 **Emission Factor Revisions.** The APCD may update the emission factors for any calculation based on USEPA AP-42 or APCD emission factors at the next permit modification or permit reevaluation to account for USEPA and/or APCD revisions to the underlying emission factors.

## **9.B Generic Conditions**

The generic conditions listed below apply to all emission units, regardless of their category or emission rates. In case of a discrepancy between the wording of a condition and the applicable federal or APCD rule(s), the wording of the rule shall control.

Section B lists the applicable 'generic' permit conditions, including emission standards for all equipment in this permit. Conditions listed in this section are enforceable by the USEPA, the APCD, the State of California and the public. Where any reference contained in this section

**PROPOSED**

PERMIT TO OPERATE 13134  
AND  
PART 70 MINOR PERMIT MODIFICATION 13134

Page 7 of 13

refers to any other part of this permit, that part of the permit referred to is federally enforceable. In case of a discrepancy between the wording of a condition and the applicable federal or APCD rule(s), the wording of the rule shall control.

- B.1 **Circumvention (Rule 301):** A person shall not build, erect, install, or use any article, machine, equipment or other contrivance, the use of which, without resulting in a reduction in the total release of air contaminants to the atmosphere, reduces or conceals an emission which would otherwise constitute a violation of Division 26 (Air Resources) of the Health and Safety Code of the State of California or of these Rules and Regulations. This Rule shall not apply to cases in which the only violation involved is of Section 41700 of the Health and Safety Code of the State of California, or of APCD Rule 303. [*Re: APCD Rule 301*]
- B.2 **Nuisance (Rule 303):** No pollutant emissions from any source at the permittee shall create nuisance conditions. Operations shall not endanger health, safety or comfort, nor shall they damage any property or business. [*Re: APCD Rule 303*]
- B.3 **Organic Solvents (Rule 317):** The permittee shall comply with the emission standards listed in Rule 317.B. Compliance with this condition shall be based on the permittee's compliance with Condition C.5 of PTO 8240-R7 and facility inspections. [*Re: APCD Rule 317*]
- B.4 **Metal Surface Coating Thinner and Reducer (Rule 322):** The use of photochemically reactive solvents as thinners or reducers in metal surface coatings is prohibited. Compliance with this condition shall be based on the permittee's compliance with Condition C.5 of PTO 8240-R7 and facility inspections. [*Re: APCD Rule 322*]
- B.5 **Architectural Coatings (Rule 323):** The permittee shall comply with the coating ROC content and handling standards listed in Section D of Rule 323 as well as the Administrative requirements listed in Section F of Rule 323. Compliance with this condition shall be based on the permittee's compliance with Condition C.5 of PTO 8240-R7 and facility inspections. [*Re: APCD Rules 323, 317, 322, 324*]
- B.6 **Disposal and Evaporation of Solvents (Rule 324):** The permittee shall not dispose through atmospheric evaporation of more than one and a half gallons of any photochemically reactive solvent per day. Compliance with this condition shall be based on the permittee's compliance with Condition C.5 of PTO 8240-R7 and facility inspections. [*Re: APCD Rule 324*]
- B.7 **Emergency Episode Plans (Rule 603):** During emergency episodes, the permittee shall implement the Emergency Episode Plan dated March 30, 1999. [*Reference APCD Rule 603*]

**PROPOSED**

**PERMIT TO OPERATE 13134**  
**AND**  
**PART 70 MINOR PERMIT MODIFICATION 13134**

Page 8 of 13

- B.8 Adhesives and Sealants (Rule 353):** The permittee shall not use adhesives, adhesive bonding primers, adhesive primers, sealants, sealant primers, or any other primers, unless the permittee complies with the following:
- (a) Such materials used are purchased or supplied by the manufacturer or suppliers in containers of 16 fluid ounces or less; or alternately
  - (b) When the permittee uses such materials from containers larger than 16 fluid ounces and the materials are not exempt by Rule 353, Section B.1, the total reactive organic compound emissions from the use of such material shall not exceed 200 pounds per year unless the substances used and the operational methods comply with Sections D, E, F, G, and H of Rule 353. Compliance shall be demonstrated by recordkeeping in accordance with Section B.2 and/or Section O of Rule 353. *[Re: APCD Rule 353]*.

**9.C Requirements and Equipment Specific Conditions**

This section contains non-generic federally-enforceable conditions, including emissions and operations limits, monitoring, recordkeeping and reporting for each specific equipment group. This section may also contain other non-generic conditions.

The permitted emission limits listed in Table 1 supersede the corresponding emission limits for this equipment listed in 8240-R7:

- C.1 Emission Limitations.** The emissions from the modifications included in this permit shall not exceed the values listed in Table 1. Compliance shall be based on the operational, monitoring, recordkeeping, and reporting conditions of this permit.



**PROPOSED**

PERMIT TO OPERATE 13134  
AND  
PART 70 MINOR PERMIT MODIFICATION 13134

Page 9 of 13

**Table 1**  
**Permitted Emissions**

	NOx	ROC	CO	SOx	PM <sub>10</sub>	PM
<b>Wash Tanks (3)</b>						
lbs/day	0.00	0.13	0.00	0.00	0.00	0.00
TPY	0.00	0.02	0.00	0.00	0.00	0.00
<b>Crude Tank</b>						
lbs/day	0.00	1.12	0.00	0.00	0.00	0.00
TPY	0.00	0.20	0.00	0.00	0.00	0.00
<b>Total</b>						
lbs/day	0.00	1.26	0.00	0.00	0.00	0.00
TPY	0.00	0.23	0.00	0.00	0.00	0.00

- C.2 **Operational Restrictions.** The permitted equipment is subject to the following operational restrictions:
- Facility Throughput Limitations.* The Newlove Lease production shall be limited to a monthly average of 3,000 barrels of (dry) oil per day. The permittee shall record in a log the volumes of oil produced and the actual number of days in production per month. The above limits are based on actual days of operation during the month.
  - Vapor Recovery System.* The vapor recovery/gas collection (VRGC) system shall be in operation when the equipment connected to the VRGC system is in use. The VRGC system includes associated valves, fittings, and flanges. The VRGC system shall be maintained and operated to minimize the release of emissions from all equipment connected to it.
  - Requirements for Produced Gas.* The emissions of produced gas shall be controlled at all times using a properly maintained and operated system that directs all produced gas, except gas used in a tank battery vapor recovery system, to one of the following: (a) a system handling gas for fuel, sale, or underground injection; or (b) a flare that combusts reactive organic compounds; or (c) a device with an ROC vapor removal efficiency of at least 90% by weight. The provisions of this condition shall not apply to wells which are undergoing routine maintenance.
- C.3 **Monitoring.** The permitted equipment is subject to the following monitoring requirements:
- The volumes of oil (in bbls) produced from this facility shall be measured through the use of calibrated meters or through the use of an APCD-approved alternate method. The

## PROPOSED

### PERMIT TO OPERATE 13134 AND PART 70 MINOR PERMIT MODIFICATION 13134

Page 10 of 13

meter shall be calibrated according to manufacturer's specifications and the calibration records shall be made available to the APCD upon request.

- b. *I&M Program:* The APCD-approved I&M Plan for this lease shall be implemented for the life of the project. The Plan, and any subsequent APCD approved revisions, is incorporated by reference as an enforceable part of this permit. An updated Fugitive Emissions Inspection and Maintenance Plan must be submitted to the APCD for review and approval within one calendar quarter whenever there is a change in the component list or diagrams

C.4 **Recordkeeping.** The following records shall be maintained by the permittee and shall be made available to the APCD upon request:

- a. The volume of oil produced each month and the number of days that oil was produced through the tank battery. On an annual basis, the API gravity and true vapor pressure, calculated at the maximum expected storage temperature of the crude oil in each storage tank shall be recorded according to the test methods described in Rule 325.G. The calculated true vapor pressure shall be based on the maximum expected operating temperature for each crude oil storage tank. This temperature shall also be recorded at the time of API gravity and vapor pressure tests. Sampling of crude oil for the vapor pressure measurement shall be completed per the *Crude Oil Sampling* condition of this permit.
- b. Records required by APCD Rules 325.F and 331.G.

C.5 **Semi-Annual Monitoring/Compliance Verification Reports.** The permittee shall submit a report to the APCD every six months to verify compliance with the emission limits and other requirements of this permit. The reporting periods shall be each half of the calendar year, e.g., January through June for the first half of the year. These reports shall be submitted by September 1 and March 1, respectively, each year, and shall be in a format approved by the APCD. All logs and other basic source data not included in the report shall be available to the APCD upon request. The second report shall also include an annual report for the prior four quarters. The report shall include the following information:

- a. The total volume (in bbls) of oil processed through the Newlove Lease tank battery each month and each calendar year, and the number of days each month that oil was processed.
- b. API gravity, true vapor pressure and storage temperature of the oil.

## PROPOSED

### PERMIT TO OPERATE 13134 AND PART 70 MINOR PERMIT MODIFICATION 13134

Page 11 of 13

If the data required by this condition is reported in the Compliance Verification Report for other permits for the Newlove Lease, a separate report is not required for this permit.

- C.6. **Crude Oil Sampling.** On an annual basis, at the initial tank, or other storage tanks if requested in writing by the APCD, (1) the API gravity shall be measured and recorded, and (2) the true vapor pressure (TVP) at the maximum expected temperature of the crude oil shall be measured by using ASTM method D 323-82 (if API gravity is equal to or greater than 20 degrees) or the HOST Method (if API gravity is under 20 degrees), and recorded. Samples of crude oil shall be obtained from an active flow line into any tank sampled, or from the tank, provided that there is an active flow of crude oil into the tank.

If ASTM D323 applies, the TVP at the maximum expected temperature shall be calculated from the Reid vapor pressure in accordance with API Bulletin 2518, or equivalent Reid/true vapor pressure correlation. The calculated true vapor pressure shall be based on the maximum expected operating temperature for each crude oil storage tank.

## 9.D ***APCD-Only Conditions***

The following section lists permit conditions that are not enforceable by the USEPA or the public. However, these conditions are enforceable by the APCD and the State of California. These conditions are issued pursuant to APCD Rule 206 (*Conditional Approval of Authority to Construct or Permit to Operate*), which states that the Control Officer may issue an operating permit subject to specified conditions. Permit conditions have been determined as being necessary for this permit to ensure that operation of the facility complies with all applicable local and state air quality rules, regulations and laws. Failure to comply with any condition specified pursuant to the provisions of Rule 206 shall be a violation of that rule, this permit, as well as any applicable section of the California Health & Safety Code.

Permit condition D.1 supersedes permit condition D.3 of PTO 8240-R7.

- D.1 **Facility Throughput Limitations.** The Newlove Lease production shall be limited to a monthly average of 3,000 barrels of (dry) oil per day. The permittee shall record in a log the volumes of oil produced and the actual number of days in production per month. The above limits are based on actual days of operation during the month.

**PROPOSED**

PERMIT TO OPERATE 13134  
AND  
PART 70 MINOR PERMIT MODIFICATION 13134

Page 12 of 13

- D.2 **Permit Activation.** All aspects of this permit are enforceable by the APCD and the State of California upon the issuance date stamped below. The Part 70 aspects of this permit are not final until:
- (a) The USEPA has provided written comments to the APCD and these comments require no modification to this permit. The APCD will issue a letter stating that this permit is a final Part 70 permit. The effective date that this permit will be considered a final Part 70 permit will be the date stamped on the APCD's letter.

**PROPOSED**

PERMIT TO OPERATE 13134  
AND  
PART 70 MINOR PERMIT MODIFICATION 13134

Page 13 of 13

- (b) After the USEPA has provided the APCD written comments that require a modification to this permit, the APCD will modify this permit to address the USEPA's comments and issue the Part 70 permit as final. The re-issued permit will supersede this permit in its entirety.

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AIR POLLUTION CONTROL OFFICER

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DATE

Attachments:

- Emission Tables
- Permit Equipment List
- Permit Evaluation for Permit to Operate 13134

Notes:

- Reevaluation Due Date: June 2, 2012
- Stationary sources are subject to an annual emission fee (see Fee Schedule B-3 of Rule 210).
- This permit supersedes Authority to Construct 13134

## PROPOSED RAFT

### Equipment List for Permit to Operate 13134

Page 1 of 1

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#### PERMIT EQUIPMENT LIST - TABLE A

PTO 13134 / FID: 03321 Newlove Lease / SSID: 02667

#### A PERMITTED EQUIPMENT

##### 1 Vapor Recovery System

<i>Device ID #</i>	<b>112557</b>	<i>Device Name</i>	<b>Vapor Recovery System</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	15.00 Horsepower (Electric Motor)
<i>Manufacturer</i>	Hy-Bon Engineering	<i>Operator ID</i>	
<i>Model</i>	HB 50	<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>	Serving one wastewater tank (107475), three wash tanks (2973, 2978, & 2979), and one crude tank (2974). The vapor recovery efficiency is assumed to be 95% by weight at each vapor recovery point.		



## **PROPOSED**

### **PERMIT EVALUATION FOR PERMIT TO OPERATE 13134**

Page 1 of 4

#### **1.0 BACKGROUND**

- 1.1 General: Authority to Construct 13134 was issued on June 15, 2009. The permit is for the replacement of the existing vapor recovery system with a new vapor recovery system as well as an increase in throughput to the tank battery. The Source Compliance Demonstration Period (SCDP) inspection was conducted on July 16, 2009. The inspection report indicates that the SCDP conditions were satisfied. The permit to operate application was submitted August 7, 2009.
- 1.2 Permit History: See Pt70 PTO 8240-R7 for a complete permit history of this facility.
- 1.3 Compliance History: See Pt70 PTO 8240-R7 for a complete compliance history of this facility.

#### **2.0 ENGINEERING ANALYSIS**

- 2.1 Equipment/Processes: The vapor recovery system includes all piping, valves, and flanges associated with the vapor recovery system. Vapors from the tank battery are collected and routed to the gas gathering system.
- 2.2 Emission Controls: The vapor recovery system is a control system that provides 95% control efficiency to the equipment it serves.
- 2.3 Emission Factors: Fugitive emissions were not calculated for the replacement of the compressor because there is no increase in the number for fugitive hydrocarbon leak paths due to the replacement. BreitBurn supplied before and after component counts and they are included in the administrative permit for this permit. Throughput change calculations are attached.
- 2.4 Reasonable Worst Case Emission Scenario: Worst case emissions are based on operation of this facility 24 hours/day, 365 days per year.
- 2.5 Emission Calculations: Detailed emission calculation spreadsheets are attached to this engineering evaluation. These emissions define the Potential to Emit for the facility.

## **PROPOSED**

### **PERMIT EVALUATION FOR PERMIT TO OPERATE 13134**

Page 2 of 4

- 2.6 Special Calculations: BreitBurn provided detailed specifications for the replacement compressor along with vapor recovery calculations. The calculations indicate an emission flow rate of 1.6 Mscf/day from the tanks. The specifications show that the design capacity of the new compressor is 69 Mscf/day. Thus the replacement compressor has adequate capacity to handle the emissions from the tanks connected to the vapor recovery system. These specifications and calculations are in the administrative file for this permit.
- 2.7 BACT Analyses: Best Available Control Technology was not required for this project.
- 2.8 Enforceable Operational Limits: The permit has enforceable operating conditions that ensure the equipment is operated properly.
- 2.9 Monitoring Requirements: This permit requires that the vapor recovery system (VRS) be in operation when the equipment connected to the VRS system is in use.
- 2.10 Recordkeeping and Reporting Requirements: PTO 8240-R7 requires that the data which is monitored be recorded and reported to the APCD.

### **3.0 REEVALUATION REVIEW (not applicable)**

### **4.0 REGULATORY REVIEW**

- 4.1 Partial List of Applicable Rules: This project is anticipated to operate in compliance with the following rules:
- Rule 101. Compliance of Existing Facilities
  - Rule 201. Permits Required
  - Rule 202. Exemptions to Rule 201
  - Rule 205. Standards for Granting Permits
  - Rule 303. Nuisance
  - Rule 325. Crude Oil Production and Separation
  - Rule 331. Fugitive Emissions Inspection and Maintenance
  - Rule 505. Breakdown Procedures
  - Rule 801. New Source Review
  - Rule 802. Nonattainment Review
  - Rule 803. Prevention of Significant Deterioration
- 4.2 Rules Requiring Review: None
- 4.3 NEI Calculations: The net emission increase calculation is used to determine whether certain requirements must be applied to a project (e.g., offsets, AQIA, PSD BACT). The increase in



## PROPOSED

### PERMIT EVALUATION FOR PERMIT TO OPERATE 13134

Page 3 of 4

throughput contributes to the NEI for this facility. The NEI for the stationary source is listed in Attachment "A".

#### 5.0 AQIA

The project is not subject to the Air Quality Impact Analysis requirements of Regulation VIII.

#### 6.0 OFFSETS/ERCs

6.1 Offsets: This permit action does not exceed the emission offset thresholds of Regulation VIII.

6.2 ERCs: This permit action does not generate emission reduction credits.

#### 7.0 AIR TOXICS

An air toxics health risk assessment was not performed for this permitting action.

#### 8.0 CEQA / LEAD AGENCY

This project is exempt from CEQA pursuant to the Environmental Review Guidelines for the Santa Barbara County APCD (revised November 16, 2000). Appendix A (*APCD Projects Exempt from CEQA and Equipment or Operations Exempt from CEQA*) provides an exemption specifically for permits to operate. No further action is necessary.

#### 9.0 SCHOOL NOTIFICATION

A school notice pursuant to the requirements of H&SC §42301.6 was not required.

#### 10.0 PUBLIC and AGENCY NOTIFICATION PROCESS

This project was not subject to public notice.

#### 11.0 FEE DETERMINATION

Fees for the APCD's work effects are assessed on a fee basis. The Project Code is 300000 (*Oil and Gas*). See the *Fee Statement* Attachment for the fee calculations.

#### 12.0 RECOMMENDATION

It is recommended that this permit be granted with the conditions as specified in the permit.

<u>J . Menno</u>	<u>June 2010</u>	<u></u>	<u>June 2010</u>
AQ Engineer	Date	Supervisor	Date

#### 13.0 ATTACHMENTS

A. Emission Calculations

**PROPOSED**

**PERMIT EVALUATION FOR  
PERMIT TO OPERATE 13134**

Page 4 of 4

- B. IDS Tables
- C. Fee Statement

# ATTACHMENT “A”

## Emission Calculations

# **FIXED ROOF TANK CALCULATION (AP-42: Chapter 7 Method)**

Basic Input Data	
liquid {1:G13, 2:G10, 3:G7, 4:C, 5:JP, 6:ker, 7:O2, 8:O6} =	4
liquid TVP =	3.2
if TVP is entered, enter TVP temperature (°F) =	120
tank heated {yes, no} =	no
if tank is heated, enter temp (°F) =	
vapor recovery system present? {yes, no} =	yes
is this a wash tank? {yes, no} =	yes
will flashing losses occur in this tank? {yes, no} =	no
breather vent pressure setting range (psi) (def = 0.06):	0.06

Attachment: A-1  
 Permit: PTO 13134  
 Date: 05/27/10  
 Tank: Wash Tank  
 Name: Newlove Lease  
 Filename:  
 District: Santa Barbara  
 Version: Tank-2b.xls

PRINT

Tank Data	
diameter (feet) =	29.7
capacity (enter barrels in first col, gals will compute) =	3,000 126,000
conical or dome roof? {c, d} =	c
shell height (feet) =	24
roof height (def = 1):	1
ave liq height (feet):	23
color {1:Spec Al, 2:Diff Al, 3:Lite, 4:Med, 5:Rd, 6:Wh} =	4
condition {1: Good, 2: Poor} =	1
upstream pressure (psig) (def = 0 when no flashing occurs):	0

Liquid Data		A	B
maximum daily throughput (bopd) =			3,000
Ann thrupt (gal): (enter value in Column A if not max PTE)			4.599E+07
RVP (psia):			2.1455
°API gravity =			25

Computed Values	
roof outage <sup>1</sup> (feet):	0.3
vapor space volume <sup>2</sup> (cubic feet):	901
turnovers <sup>3</sup> :	365
turnover factor <sup>4</sup> :	0.25
paint factor <sup>5</sup> :	0.68
surface temperatures (°R, °F)	
average <sup>6</sup> :	527.2 67.2
maximum <sup>7</sup> :	539 79
minimum <sup>8</sup> :	515.4 55.4
product factor <sup>9</sup> :	0.75
diurnal vapor ranges	
temperature <sup>10</sup> (fahrenheit degrees):	47.2
vapor pressure <sup>11</sup> (psia):	0.576496
molecular weight <sup>12</sup> (lb/lb-mol):	50
TVP <sup>13</sup> (psia) [adjusted for ave liquid surface temp]:	1.07212
vapor density <sup>14</sup> (lb/cubic foot):	0.009475
vapor expansion factor <sup>15</sup> :	0.127
vapor saturation factor <sup>16</sup> :	0.931212
vented vapor volume (scf/bbl):	8
fraction ROG - flashing losses:	0.308
fraction ROG - evaporative losses:	0.885

Paint Factor Matrix		
paint color	paint condition	
	good	poor
spec alum	0.39	0.49
diff alum	0.60	0.68
lite grey	0.54	0.63
med grey	0.68	0.74
red	0.89	0.91
white	0.17	0.34

Molecular Weight Matrix	
liquid	mol wt
gas rvp 13	62
gas rvp 10	66
gas rvp 7	68
crude oil	50
JP -4	80
jet kerosene	130
fuel oil 2	130
fuel oil 6	190

Adjusted TVP Matrix	
liquid	TVP value
gas rvp 13	7.908
gas rvp 10	5.56
gas rvp 7	3.932
crude oil	1.07212
JP -4	1.516
jet kerosene	0.0103
fuel oil 2	0.009488
fuel oil 6	0.0000472

RVP Matrix	
liquid	RVP value
gas rvp 13	13
gas rvp 10	10
gas rvp 7	7
crude oil	2.1455
JP -4	2.7
jet kerosene	0.029
fuel oil 2	0.022
fuel oil 6	0.00019

Long-Term  
 VRU\_Eff = 95.00%

Short-Term  
 VRU\_Eff = 95.00%

Emissions	Uncontrolled ROC emissions			Controlled ROC emissions		
	lb/hr	lb/day	ton/year	lb/hr	lb/day	ton/year
breathing loss <sup>17</sup> =	0.04	0.89	0.16	0.00	0.04	0.01
working loss <sup>18</sup> =	0.00	0.00	0.00	0.00	0.00	0.00
flashing loss <sup>19</sup> =	0.00	0.00	0.00	0.00	0.00	0.00
<b>TOTALS</b> =	<b>0.04</b>	<b>0.89</b>	<b>0.16</b>	<b>0.00</b>	<b>0.04</b>	<b>0.01</b>

# **FIXED ROOF TANK CALCULATION (AP-42: Chapter 7 Method)**

Basic Input Data	
liquid {1:G13, 2:G10, 3:G7, 4:C, 5:JP, 6:ker, 7:O2, 8:O6} =	4
liquid TVP =	3.2
if TVP is entered, enter TVP temperature (°F) =	120
tank heated {yes, no} =	no
if tank is heated, enter temp (°F) =	
vapor recovery system present? {yes, no} =	yes
is this a wash tank? {yes, no} =	no
will flashing losses occur in this tank? {yes, no} =	no
breather vent pressure setting range (psi) (def = 0.06):	0.06

Attachment: A-2  
 Permit: PTO 13134  
 Date: 05/27/10  
 Tank: Crude Tank  
 Name: Newlove Lease  
 Filename:  
 District: Santa Barbara  
 Version: Tank-2b.xls

PRINT

Tank Data	
diameter (feet) =	21.5
capacity (enter barrels in first col, gals will compute) =	1,000 42,000
conical or dome roof? {c, d} =	c
shell height (feet) =	16
roof height (def = 1):	1
ave liq height (feet):	8
color {1:Spec Al, 2:Diff Al, 3:Lite, 4:Med, 5:Rd, 6:Wh} =	4
condition {1: Good, 2: Poor} =	1
upstream pressure (psig) (def = 0 when no flashing occurs):	0

Liquid Data		A	B
maximum daily throughput (bopd) =			3,000
Ann thruput (gal): (enter value in Column A if not max PTE)			4.599E+07
RVP (psia):			2.1455
°API gravity =			25

Computed Values	
roof outage <sup>1</sup> (feet):	0.3
vapor space volume <sup>2</sup> (cubic feet):	3,013
turnovers <sup>3</sup> :	1095
turnover factor <sup>4</sup> :	0.19
paint factor <sup>5</sup> :	0.68
surface temperatures (°R, °F)	
average <sup>6</sup> :	527.2 67.2
maximum <sup>7</sup> :	539 79
minimum <sup>8</sup> :	515.4 55.4
product factor <sup>9</sup> :	0.75
diurnal vapor ranges	
temperature <sup>10</sup> (fahrenheit degrees):	47.2
vapor pressure <sup>11</sup> (psia):	0.576496
molecular weight <sup>12</sup> (lb/lb-mol):	50
TVP <sup>13</sup> (psia) [adjusted for ave liquid surface temp]:	1.07212
vapor density <sup>14</sup> (lb/cubic foot):	0.009475
vapor expansion factor <sup>15</sup> :	0.127
vapor saturation factor <sup>16</sup> :	0.679521
vented vapor volume (scf/bbl):	8
fraction ROG - flashing losses:	0.308
fraction ROG - evaporative losses:	0.885

Paint Factor Matrix		
paint color	paint condition	
	good	poor
spec alum	0.39	0.49
diff alum	0.60	0.68
lite grey	0.54	0.63
med grey	0.68	0.74
red	0.89	0.91
white	0.17	0.34

Molecular Weight Matrix	
liquid	mol wt
gas rvp 13	62
gas rvp 10	66
gas rvp 7	68
crude oil	50
JP -4	80
jet kerosene	130
fuel oil 2	130
fuel oil 6	190

Adjusted TVP Matrix	
liquid	TVP value
gas rvp 13	7.908
gas rvp 10	5.56
gas rvp 7	3.932
crude oil	1.07212
JP -4	1.516
jet kerosene	0.0103
fuel oil 2	0.009488
fuel oil 6	0.0000472

RVP Matrix	
liquid	RVP value
gas rvp 13	13
gas rvp 10	10
gas rvp 7	7
crude oil	2.1455
JP -4	2.7
jet kerosene	0.029
fuel oil 2	0.022
fuel oil 6	0.00019

Long-Term  
 VRU\_Eff = 95.00%

Short-Term  
 VRU\_Eff = 95.00%

Emissions	Uncontrolled ROC emissions			Controlled ROC emissions		
	lb/hr	lb/day	ton/year	lb/hr	lb/day	ton/year
breathing loss <sup>17</sup> =	0.09	2.18	0.40	0.00	0.11	0.02
working loss <sup>18</sup> =	0.85	20.28	3.70	0.04	1.01	0.19
flashing loss <sup>19</sup> =	0.00	0.00	0.00	0.00	0.00	0.00
<b>TOTALS</b> =	<b>0.94</b>	<b>22.46</b>	<b>4.10</b>	<b>0.05</b>	<b>1.12</b>	<b>0.20</b>

# **FIXED ROOF TANK CALCULATION (AP-42: Chapter 7 Method)**

Basic Input Data	
liquid {1:G13, 2:G10, 3:G7, 4:C, 5:JP, 6:ker, 7:O2, 8:O6} =	4
liquid TVP =	3.2
if TVP is entered, enter TVP temperature (°F) =	120
tank heated {yes, no} =	no
if tank is heated, enter temp (°F) =	
vapor recovery system present? {yes, no} =	yes
is this a wash tank? {yes, no} =	yes
will flashing losses occur in this tank? {yes, no} =	no
breather vent pressure setting range (psi) (def = 0.06):	0.06

Attachment: A-3  
 Permit: PTO 13134 - NEI  
 Date: 05/27/10  
 Tank: Wash Tank  
 Name: Newlove Lease  
 Filename:  
 District: Santa Barbara  
 Version: Tank-2b.xls

PRINT

Tank Data	
diameter (feet) =	29.7
capacity (enter barrels in first col, gals will compute) =	3,000 126,000
conical or dome roof? {c, d} =	c
shell height (feet) =	24
roof height (def = 1):	1
ave liq height (feet):	23
color {1:Spec Al, 2:Diff Al, 3:Lite, 4:Med, 5:Rd, 6:Wh} =	4
condition {1: Good, 2: Poor} =	1
upstream pressure (psig) (def = 0 when no flashing occurs):	0

Liquid Data		A	B
maximum daily throughput (bopd) =			1.900
Ann thruput (gal): (enter value in Column A if not max PTE)			2.913E+07
RVP (psia):			2.1455
°API gravity =			25

Computed Values	
roof outage <sup>1</sup> (feet):	0.3
vapor space volume <sup>2</sup> (cubic feet):	901
turnovers <sup>3</sup> :	231.17
turnover factor <sup>4</sup> :	0.3
paint factor <sup>5</sup> :	0.68
surface temperatures (°R, °F)	
average <sup>6</sup> :	527.2 67.2
maximum <sup>7</sup> :	539 79
minimum <sup>8</sup> :	515.4 55.4
product factor <sup>9</sup> :	0.75
diurnal vapor ranges	
temperature <sup>10</sup> (fahrenheit degrees):	47.2
vapor pressure <sup>11</sup> (psia):	0.576496
molecular weight <sup>12</sup> (lb/lb-mol):	50
TVP <sup>13</sup> (psia) [adjusted for ave liquid surface temp]:	1.07212
vapor density <sup>14</sup> (lb/cubic foot):	0.009475
vapor expansion factor <sup>15</sup> :	0.127
vapor saturation factor <sup>16</sup> :	0.931212
vented vapor volume (scf/bbl):	8
fraction ROG - flashing losses:	0.308
fraction ROG - evaporative losses:	0.885

Paint Factor Matrix		
paint color	paint condition	
	good	poor
spec alum	0.39	0.49
diff alum	0.60	0.68
lite grey	0.54	0.63
med grey	0.68	0.74
red	0.89	0.91
white	0.17	0.34

Molecular Weight Matrix	
liquid	mol wt
gas rvp 13	62
gas rvp 10	66
gas rvp 7	68
crude oil	50
JP -4	80
jet kerosene	130
fuel oil 2	130
fuel oil 6	190

Adjusted TVP Matrix	
liquid	TVP value
gas rvp 13	7.908
gas rvp 10	5.56
gas rvp 7	3.932
crude oil	1.07212
JP -4	1.516
jet kerosene	0.0103
fuel oil 2	0.009488
fuel oil 6	0.0000472

RVP Matrix	
liquid	RVP value
gas rvp 13	13
gas rvp 10	10
gas rvp 7	7
crude oil	2.1455
JP -4	2.7
jet kerosene	0.029
fuel oil 2	0.022
fuel oil 6	0.00019

Long-Term  
 VRU\_Eff = 95.00%

Short-Term  
 VRU\_Eff = 95.00%

Emissions	Uncontrolled ROC emissions			Controlled ROC emissions		
	lb/hr	lb/day	ton/year	lb/hr	lb/day	ton/year
breathing loss <sup>17</sup> =	0.04	0.89	0.16	0.00	0.04	0.01
working loss <sup>18</sup> =	0.00	0.00	0.00	0.00	0.00	0.00
flashing loss <sup>19</sup> =	0.00	0.00	0.00	0.00	0.00	0.00
<b>TOTALS</b> =	<b>0.04</b>	<b>0.89</b>	<b>0.16</b>	<b>0.00</b>	<b>0.04</b>	<b>0.01</b>

# **FIXED ROOF TANK CALCULATION (AP-42: Chapter 7 Method)**

Basic Input Data	
liquid {1:G13, 2:G10, 3:G7, 4:C, 5:JP, 6:ker, 7:O2, 8:O6} =	4
liquid TVP =	3.2
if TVP is entered, enter TVP temperature (°F) =	120
tank heated {yes, no} =	no
if tank is heated, enter temp (°F) =	
vapor recovery system present? {yes, no} =	yes
is this a wash tank? {yes, no} =	no
will flashing losses occur in this tank? {yes, no} =	no
breather vent pressure setting range (psi) (def = 0.06):	0.06

Attachment: A-4  
 Permit: PTO 13134 - NEI  
 Date: 05/27/10  
 Tank: Crude Tank  
 Name: Newlove Lease  
 Filename:  
 District: Santa Barbara  
 Version: Tank-2b.xls

PRINT

Tank Data	
diameter (feet) =	21.5
capacity (enter barrels in first col, gals will compute) =	1,000 42,000
conical or dome roof? {c, d} =	c
shell height (feet) =	16
roof height (def = 1):	1
ave liq height (feet):	8
color {1:Spec Al, 2:Diff Al, 3:Lite, 4:Med, 5:Rd, 6:Wh} =	4
condition {1: Good, 2: Poor} =	1
upstream pressure (psig) (def = 0 when no flashing occurs):	0

Liquid Data		A	B
maximum daily throughput (bopd) =			1,900
Ann thrupt (gal): (enter value in Column A if not max PTE)			2.913E+07
RVP (psia):			2.1455
°API gravity =			25

Computed Values	
roof outage <sup>1</sup> (feet):	0.3
vapor space volume <sup>2</sup> (cubic feet):	3,013
turnovers <sup>3</sup> :	693.5
turnover factor <sup>4</sup> :	0.21
paint factor <sup>5</sup> :	0.68
surface temperatures (°R, °F)	
average <sup>6</sup> :	527.2 67.2
maximum <sup>7</sup> :	539 79
minimum <sup>8</sup> :	515.4 55.4
product factor <sup>9</sup> :	0.75
diurnal vapor ranges	
temperature <sup>10</sup> (fahrenheit degrees):	47.2
vapor pressure <sup>11</sup> (psia):	0.576496
molecular weight <sup>12</sup> (lb/lb-mol):	50
TVP <sup>13</sup> (psia) [adjusted for ave liquid surface temp]:	1.07212
vapor density <sup>14</sup> (lb/cubic foot):	0.009475
vapor expansion factor <sup>15</sup> :	0.127
vapor saturation factor <sup>16</sup> :	0.679521
vented vapor volume (scf/bbl):	8
fraction ROG - flashing losses:	0.308
fraction ROG - evaporative losses:	0.885

Paint Factor Matrix		
paint color	paint condition	
	good	poor
spec alum	0.39	0.49
diff alum	0.60	0.68
lite grey	0.54	0.63
med grey	0.68	0.74
red	0.89	0.91
white	0.17	0.34

Molecular Weight Matrix	
liquid	mol wt
gas rvp 13	62
gas rvp 10	66
gas rvp 7	68
crude oil	50
JP -4	80
jet kerosene	130
fuel oil 2	130
fuel oil 6	190

Adjusted TVP Matrix	
liquid	TVP value
gas rvp 13	7.908
gas rvp 10	5.56
gas rvp 7	3.932
crude oil	1.07212
JP -4	1.516
jet kerosene	0.0103
fuel oil 2	0.009488
fuel oil 6	0.0000472

RVP Matrix	
liquid	RVP value
gas rvp 13	13
gas rvp 10	10
gas rvp 7	7
crude oil	2.1455
JP -4	2.7
jet kerosene	0.029
fuel oil 2	0.022
fuel oil 6	0.00019

Long-Term  
 VRU\_Eff = 95.00%

Short-Term  
 VRU\_Eff = 95.00%

Emissions	Uncontrolled ROC emissions			Controlled ROC emissions		
	lb/hr	lb/day	ton/year	lb/hr	lb/day	ton/year
breathing loss <sup>17</sup> =	0.09	2.18	0.40	0.00	0.11	0.02
working loss <sup>18</sup> =	0.59	14.20	2.59	0.03	0.71	0.13
flashing loss <sup>19</sup> =	0.00	0.00	0.00	0.00	0.00	0.00
<b>TOTALS</b> =	<b>0.68</b>	<b>16.38</b>	<b>2.99</b>	<b>0.03</b>	<b>0.82</b>	<b>0.15</b>

# ATTACHMENT “B”

## IDS Tables



**Table 1.**  
**Permitted Potential to Emit**

	<b>NOx</b>	<b>ROC</b>	<b>CO</b>	<b>SOx</b>	<b>PM<sub>10</sub></b>	<b>PM</b>
<b>ATC 13134</b>						
lbs/day	0.00	1.26	0.00	0.00	0.00	0.00
TPY	0.00	0.23	0.00	0.00	0.00	0.00

**Table 2.**  
**Facility Potential to Emit**

	<b>NOx</b>	<b>ROC</b>	<b>CO</b>	<b>SOx</b>	<b>PM<sub>10</sub></b>	<b>PM</b>
<b>ATC 13134</b>						
lbs/day	34.07	1212.73	42.05	50.12	33.05	33.05
TPY	3.82	21.04	5.82	3.06	2.74	2.74

**Table 3 .**  
**Exempt Emissions**

	<b>NOx</b>	<b>ROC</b>	<b>CO</b>	<b>SOx</b>	<b>PM<sub>10</sub></b>	<b>PM</b>
<b>Newlove Lease</b>						
TPQ	0.00	0.84	0.00	0.00	0.00	0.00
TPY	0.00	0.15	0.00	0.00	0.00	0.00

**Facility Emissions Summary**  
**Newlove Lease FID 3321**

**I. This Projects "T" NEI-90**

Permit No.	Date Issued	NOx		ROC		CO		SOx		PM		PM10	
		lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr

**II. This Facility's "P1s"**

Enter all facility "P1" NEI-90s below:

Permit No.	Date Issued	NOx		ROC		CO		SOx		PM		PM10	
		lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr
P11909	05/23/06			1.50	0.27								
A12084 <sub>1</sub>	06/05/07	16.50	3.01	25.35	3.21	28.50	5.20	5.55	1.01	9.00	1.64	9.00	1.64
A12084 <sub>2</sub>	06/05/07	33.00	6.02	26.71	4.23	57.00	10.40	11.11	2.03	18.00	3.29	18.00	3.29
P12144	08/31/07			0.00	0.00								
P12354	01/10/08			0.23	0.04								
A12273	07/18/07			0.04	0.01								
A13000	07/17/09	17.57	1.67	2.02	0.24	44.57	4.24	3.89	0.37	24.05	2.29	24.05	2.29
A13134	05/27/09			0.95	0.17								
A13140	12/02/09			12.28	2.24								
P13141	08/26/09			0.20	0.04								
A13230	TBD			7.28	1.33								
<b>Totals</b>		<b>67.07</b>	<b>10.70</b>	<b>76.56</b>	<b>11.78</b>	<b>130.07</b>	<b>19.84</b>	<b>20.55</b>	<b>3.41</b>	<b>51.05</b>	<b>7.22</b>	<b>51.05</b>	<b>7.22</b>
Notes: (1) Facility NEI from IDS. (2) Totals only apply to permits for this facility ID. Totals may not appear correct due to rounding. (3) Because of rounding, values in this table shown as 0.00 are less than 0.005, but greater than zero. (4) ATC 12084 shows Phase 1 and Phase 2 NEI separately													

**III. This Facility's "P2" NEI-90 Decreases**

Enter all facility "P2" NEI-90s below:

Permit No.	Date Issued	NOx		ROC		CO		SOx		PM		PM10	
		lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr
A12084-01													
P12084													
A13000		13.15	0.87	1.15	0.08	33.36	2.19	2.92	0.19	18.00	1.18	18.00	1.18
<b>Totals</b>		<b>13.15</b>	<b>0.87</b>	<b>1.15</b>	<b>0.08</b>	<b>33.36</b>	<b>2.19</b>	<b>2.92</b>	<b>0.19</b>	<b>18.00</b>	<b>1.18</b>	<b>18.00</b>	<b>1.18</b>
Notes: (1) Facility NEI from IDS. (2) Totals only apply to permits for this facility ID. Totals may not appear correct due to rounding. (3) Because of rounding, values in this table shown as 0.00 are less than 0.005, but greater than zero.													

**IV. This Facility's Pre-90 "D" Decreases**

Enter all facility "D" decreases below:

Permit No.	Date Issued	NOx		ROC		CO		SOx		PM		PM10	
		lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr
P11909	05/23/06			1.50	0.27								
P12354	01/10/08			0.23	0.04								
P12273	07/17/09			0.04	0.01								
<b>Totals</b>		<b>0.00</b>	<b>0.00</b>	<b>1.77</b>	<b>0.32</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>
Notes: (1) Facility "D" from IDS. (2) Totals only apply to permits for this facility ID. Totals may not appear correct due to rounding. (3) Because of rounding, values in this table shown as 0.00 are less than 0.005, but greater than zero.													

**V. Calculated This Facility's NEI-90**

Table below summarizes facility NEI-90 as equal to: I+ (P1-P2) -D

Term	NOx		ROC		CO		SOx		PM		PM10	
	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr
Project "T"	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
P1	67.07	10.70	76.56	11.78	130.07	19.84	20.55	3.41	51.05	7.22	51.05	7.22
P2	13.15	0.87	1.15	0.08	33.36	2.19	2.92	0.19	18.00	1.18	18.00	1.18
D	0.00	0.00	1.77	0.32	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>FNEI-90</b>	<b>53.92</b>	<b>9.83</b>	<b>73.64</b>	<b>11.38</b>	<b>96.71</b>	<b>17.65</b>	<b>17.63</b>	<b>3.22</b>	<b>33.05</b>	<b>6.04</b>	<b>33.05</b>	<b>6.04</b>
Notes: (1) Resultant FNEI-90 from above Section I thru IV data. (2) Totals only apply to permits for this facility ID. Totals may not appear correct due to rounding. (3) Because of rounding, values in this table shown as 0.00 are less than 0.005, but greater than zero.												

**Calculated This Facility's NEI-90 (adjusted) <sup>1</sup>**

Table below summarizes facility NEI-90 adjusted to only show ATC 12084 Phase 1 NEI contribution

<b>FNEI-90 (adjusted)</b>	<b>20.92</b>	<b>3.81</b>	<b>46.93</b>	<b>7.15</b>	<b>39.71</b>	<b>7.25</b>	<b>6.52</b>	<b>1.19</b>	<b>15.05</b>	<b>2.75</b>	<b>15.05</b>	<b>2.75</b>
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Notes: (1) Table shown is without Phase 2 ATC 12084 NEI contribution

## BreitBurn Energy Company LP Orcutt Hill Stationary Source

Enter all other facility NEI-90s below:

Table below summarizes Stationary Source NEI-90 as equal to sum of each facility's (unless footnoted by an enforceable NEI scenario)

Table below summarizes Stationary Source NEI-90 (**adjusted**)

Term	NOx		ROC		CO		SOx		PM		PM10	
	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr
<b>SSN NEI-90</b>	<b>38.01</b>	<b>5.13</b>	<b>57.59</b>	<b>9.00</b>	<b>59.47</b>	<b>9.35</b>	<b>9.14</b>	<b>1.57</b>	<b>18.42</b>	<b>3.36</b>	<b>18.42</b>	<b>3.36</b>
Notes:	(1) This Stationary Source NEI (adjusted) is applicable to all stationary source offset determinations until such time Phase 2 construction begins under ATC 12084. See NEI discussion in Engineering Evaluation in PTO 12273 for more details.											

# ATTACHMENT “C”

## Fee Statement

## FEE STATEMENT

PTO No. 13134

FID: 03321 Newlove Lease / SSID: 02667



### Device Fee

Device No.	Device Name	Fee Schedule	Qty of Fee Units	Fee per Unit	Fee Units	Max or Min. Fee Apply?	Number of Same Devices	Pro Rate Factor	Device Fee	Penalty Fee?	Fee Credit	Total Fee per Device
112557	Vapor Recovery System	A2	15.000	30.41	Per total rated hp	No	1	1.000	456.15	0.00	0.00	456.15
Device Fee Sub-Totals =									<b>\$456.15</b>	<b>\$0.00</b>	<b>\$0.00</b>	
Device Fee Total =												<b>\$456.15</b>

### Permit Fee

Fee Based on Devices

456.15

**Fee Statement Grand Total = \$456**

#### Notes:

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- (1) Fee Schedule Items are listed in APCD Rule 210, Fee Schedule "A".
  - (2) The term "Units" refers to the unit of measure defined in the Fee Schedule.